

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY		U.S. BANKRUPTCY COURT FILED CAMDEN, NJ 2019 FEB -5 P 3:06
Caption in compliance with D.N.J. LBR 9004-2(c)		JEANNE A. ... BY:
Jeffrey B. Saper, Esq. 180 Tuckerton Road, Suite 2 Medford, New Jersey 08055 609 868 5336		
In Re: Gregory J. and Stacy G. Miller, Debtors		Case No.: 17-21984 Chapter: 13 Judge: Poslusny

CHAPTER 13 DEBTORS' CERTIFICATION IN OPPOSITION TO

 x **CREDITOR'S MOTION OR CERTIFICATION OF DEFAULT**

 TRUSTEE'S MOTION OR CERTIFICATION OF DEFAULT

The Debtor in the above-captioned Chapter 13 proceeding
hereby objects to the following **(choose one)** :

1. **x** Motion for Relief from the Automatic Stay filed by Wells Fargo Bank, creditor.

A hearing has been scheduled for 2/13/2019, at 10:00 AM.

OR

___ Motion to Dismiss filed by Standing Chapter 13 Trustee.

A hearing has been scheduled for , at M.

___ Certification of Default filed by , creditor.

I am requesting a hearing be scheduled in this matter.

OR

___ Certification of Default filed by Standing Chapter 13 Trustee.

I am requesting a hearing be scheduled in this matter.

2. I am objecting to the above for the following reasons
(choose one):

___ Payments have been made in the amount of \$, but have not been accounted for. Documentation in support is attached hereto.

x Payments have not been made for the following reasons and Debtor proposes repayment as follows **(explain your answer):**

- a) This is a first filing, first default case.
- b) A Modified Plan, attached hereto, is being filed simultaneously with this Certification; the post-petition arrears (\$8381) are included in same; the resulting Modified Plan will cure the post-petition arrears to be paid under the Modified Plan included creditor attorney's fees and costs; the post-petition arrears will be cured and paid, along with the remaining balance of the pre-petition arrears (\$2474), under the Modified Plan; secured creditor has already been paid \$12,918 in pre-petition arrears under the Plan.

___ Other **(explain your answer):**

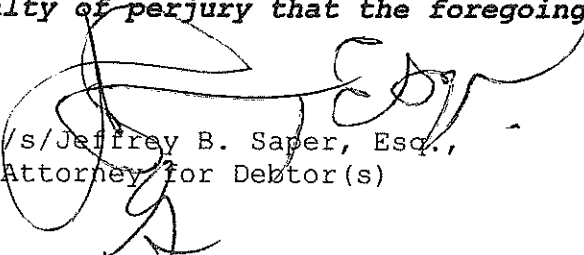
petition arrears under the Plan.

____ Other (explain your answer):

I certify under penalty of perjury that the foregoing is true and correct.

DATE:

2/4/19
1/29/19


/s/Jeffrey B. Saper, Esq.,
Attorney for Debtor(s)

DATE:

/s/Gregory J. Miller, Debtor

DATE:

1/29/19


/s/Stacy G. Miller, Joint Debtor

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Jeffrey B. Saper, Esquire
180 Tuckerton Road, Suite 2
Medford, NJ 08055
609 868 5336
JB4775

In Re:
Gregory and Stacy Miller, Debtors

U.S. BANKRUPTCY COURT
FILED
CAMDEN, NJ

2019 FEB -5 P 3:00

JEFFREY B. SAPER, ESQ.

BY: 

Case No.: 17-21984 (JNP)

Chapter: 13

Adv. No.: _____

Hearing Date: 2/13/19

Judge: Poslusny

CERTIFICATION OF SERVICE

1. I, Jeffrey B. Saper, Esq. :

☒ represent Debtors in this matter.

☐ am the secretary/paralegal for _____, who represents
_____ in this matter.

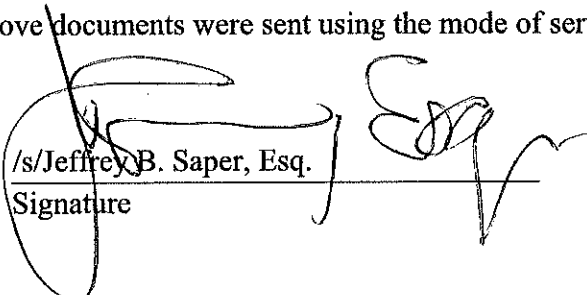
☐ am the _____ in this case and am representing myself.

2. On 2/4/19, I sent a copy of the following pleadings and/or documents
to the parties listed in the chart below.

Certification in Response to Motion to Lift Automatic Stay

3. I certify under penalty of perjury that the above documents were sent using the mode of service
indicated.

Date: 2/4/19


/s/Jeffrey B. Saper, Esq.
Signature

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Isabel C. Balboa, Esq. Chapter 13 Trustee 535 Route 38 Cherry Hill, NJ n08002	Chapter 13 Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF/CM</u> (As authorized by the Court or by rule. Cite the rule if applicable.)
Shapiro & DeNardo 14000 Commerce Pkwy., Suite B Mt. Laurel, NJ 089054	Secured Creditor and Moving Party	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>FedEx</u> (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)